

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

TRUSTEES of the CHICAGO REGIONAL  
COUNCIL OF CARPENTERS PENSION FUND,  
CHICAGO REGIONAL COUNCIL OF  
CARPENTERS WELFARE FUND, and CHICAGO  
REGIONAL COUNCIL OF CARPENTERS  
APPRENTICE & TRAINEE PROGRAM FUND

Plaintiffs,

v.

FULL COURT SPORTS FLOORS, INC., and  
KEITH COOTE, individually and  
d/b/a Full Court Sports Floors, Inc.

Defendants.

CASE NO. 08CV2067

JUDGE DER-YEGHIAYAN

**MOTION FOR DEFAULT JUDGMENT**

Plaintiffs, by its attorney, David P. Lichtman, move this Honorable Court to enter Judgment by Default according to Fed. R. Civ. P. 55 for Defendants' failure to appear, answer or otherwise plead. Further, in support of this Motion the Plaintiffs state:

1. Plaintiffs filed their complaint on April 11, 2008 and the summons and complaint were served via corporate service upon Corporate Secretary, Jennifer Cootes, and via abode service upon Defendant Keith Coote's wife, Jennifer Cootes, on April 16, 2008 by the Process Server. (**Exhibit A, Affidavit of Service**)

2. The Defendants have failed to appear, answer or otherwise plead within the time allowed by the Fed. R. Civ. P.

3. At all times relevant to this action, the Defendants have been bound by the provisions of a Collective Bargaining Agreement and the Trust Agreements which created the Trust Funds. Pursuant to the provisions of the Trust Agreements and the Collective Bargaining Agreement, the Defendants are required to submit monthly reports to the Trust Funds which list the number of hours worked by the Defendants' employees and to pay the ERISA contributions based on those hours.

4. The Defendants submitted the monthly contribution reports but failed to submit the ERISA contributions shown to be owed in the amount of \$20,915.82 for the months of November 2007 through February 2008. The Defendants also failed to remit the union dues it withheld from the employees' wages. The amount of dues withheld is \$1,432.90 for the period November 2007 through February 2008. **(Exhibit B Affidavit of James Rosemeyer)**

5. The Defendants owe interest on the unpaid ERISA contributions in the amount of \$396.01 pursuant to the Trust Agreements and 29 U.S.C. §1132(g)(2)(B). **(Exhibit B Affidavit of James Rosemeyer)**

6. The Defendants owe liquidated damages on the unpaid ERISA contributions in the amount of \$2,581.77 for the period January 2007 through February 2008 to the present pursuant to the Collective Bargaining Agreements, the Trust Agreements and 29 U.S.C. §1132(g)(2)(C)(iii). **(Exhibit B Affidavit of James Rosemeyer)**

7. The Defendants owe the sum of \$1,750.00 for necessary and reasonable attorney fees and costs of \$405.00 which are collectible under the terms of the Collective Bargaining Agreement, the Trust Agreements and 29 U.S.C. §1132(g)(2)(D). **(Exhibit C Affidavit of David P. Lichtman)**

WHEREFORE, Plaintiffs pray that their motion for judgment by default be granted in the amount of \$27,481.5.

Respectively submitted,

/s/ David P. Lichtman  
Attorney for the Plaintiffs

Attorney No. 6290051  
Whitfield McGann & Kettermann  
111 E. Wacker Drive  
Suite 2600  
Chicago, IL 60601  
(312) 251-9700 Fax (312) 251-9701

## **EXHIBIT LIST**

### **EXHIBIT A**

Affidavit of Service, Special Process Server

### **EXHIBIT B**

Sworn Declaration Pursuant to 28 U.S.C.A. § 1746  
James Rosemeyer, Contributions Manager

### **EXHIBIT C**

Sworn Declaration Pursuant To 28 U.S.C.A. § 1746  
David P. Lichtman, Plaintiffs Attorney

# **EXHIBIT A**

**Exhibit A**

AO 440 (Rev. 05/00) Summons in a Civil Action

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

SUMMONS IN A CIVIL CASE

TRUSTEES OF THE CHICAGO REGIONAL  
COUNCIL OF CARPENTERS PENSION  
FUND, et al.

V.

FULL COURT SPORTS FLOORS, INC., and  
KEITH COOTE, individually and  
d/b/a Full Court Sports Floors, Inc.

CASE NUMBER: 08CV2067 EDA  
JUDGE DER-YEGHIAYAN  
ASSIGNED JUDGE: MAGISTRATE JUDGE DENLOW  
DESIGNATED  
MAGISTRATE JUDGE:

TO: (Name and address of Defendant)

KEITH COOTE  
16558 ASH LANE  
LOCKPORT, IL 60441

**YOU ARE HEREBY SUMMONED** and required to serve upon PLAINTIFF'S ATTORNEY (name and address)

DAVID P. LICHTMAN  
Whitfield McGann & Ketterman  
111 E. Wacker Drive, Suite 2600  
Chicago, IL 60601

an answer to the complaint which is herewith served upon you, within 20 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You must also file your answer with the Clerk of this Court within a reasonable period of time after service.

Michael W. Dobbins, Clerk

*Esperanza Arnold*  
-----  
(By) DEPUTY CLERK



April 11, 2008

-----  
Date

ClientCaseID: N7644  
Law Firm ID: WHITFIEL



CaseReturnDate: 5/1/08

Affidavit of Special Process Server

**UNITED STATES DISTRICT COURT**

Case Number **08CV2067**

I, **MICHAEL P. FEEHAN**

FIRST DULY SWORN ON OATH STATES THAT I AM OVER 18 YEARS OF AGE AND NOT A PARTY TO THIS SUIT AND IS A REGISTERED EMPLOYEE OF ILLINOIS DEPARTMENT OF PROFESSIONAL REGULATION PRIVATE DETECTIVE AGENCY #117-001292 STERN PROCESS & INVESTIGATION LLC 205 W. RANDOLPH ST. #1210 CHICAGO IL 60606

**ABODE SERVICE**

THAT I SERVED THE WITHIN **SUMMONS AND COMPLAINT**

ON THE WITHIN NAMED DEFENDANT **KEITH COOTE**

PERSON SERVED **JENNIFER COOTE (WIFE)**


I SERVED A MEMBER OF HOUSEHOLD 13 YEARS OF AGE OR OLDER AT THE DEFENDANTS USUAL PLACE OF ABODE AND INFORMED THAT PERSON OF THE CONTENTS THEREOF AND FURTHER MAILED A COPY OF THE SUMMONS OR PROCESS IN A SEALED ENVELOPE WITH POSTAGE PREPAID TO THE DEFENDANT, AT HIS USUAL PLACE OF ABODE WITHIN TWO BUSINESS DAYS OF THE SERVICE.

That the sex, race and approximate age of the person whom I left the **SUMMONS AND COMPLAINT** are as follow:

Sex **FEMALE** Race **WHITE** Age **34**  
Height **5'2"** Build **THIN** Hair **BROWN**

LOCATION OF SERVICE **16558 ASH LANE**  
**LOCKPORT, IL, 60441**

Date Of Service: **4/16/08** Time of Service: **10:30 AM** Date Of Mailing **4/17/2008**

  
MICHAEL P. FEEHAN

4/16/2008

**Special Process Server**

P.E.R.C. #129-157466

Under penalties of perjury as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, the undersigned certifies that the statement are true and correct, except as to matters therein stated to be on information and belief and such matters the undersigned certifies as aforesaid that he/she verily believes same to be true.



# **EXHIBIT B**

**Exhibit B**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

TRUSTEES of the CHICAGO REGIONAL  
COUNCIL OF CARPENTERS PENSION FUND,  
CHICAGO REGIONAL COUNCIL OF  
CARPENTERS WELFARE FUND, and CHICAGO  
REGIONAL COUNCIL OF CARPENTERS  
APPRENTICE & TRAINEE PROGRAM FUND,

Plaintiffs,

v.

FULL COURT SPORTS FLOORS, INC., and  
KEITH COOTE, individually and  
d/b/a Full Court Sports Floors, Inc.

Defendants.

Case No. 08CV2067

Judge DER-YEGHIAYAN

**DECLARATION OF JAMES ROSEMEYER**

Pursuant to 28 U.S.C. § 1746, I, James Rosemeyer, do declare under penalty of perjury that the following is true and correct:

1. I am the Manager of the Employer Contributions Department for the Chicago Regional Council of Carpenters Pension Fund and the Chicago Regional Council of Carpenters Welfare Fund (collectively, the "Trust Funds"), and in such capacity I am authorized to make this Declaration on behalf of the Trust Funds.

2. The Defendants executed an Agreement with the Chicago Regional Council of Carpenters ("Union") whereby it agreed to be bound by the provisions of a Collective Bargaining Agreement and to all Collective Bargaining Agreements subsequently negotiated.



3. Pursuant to the provisions of the Agreement and the Collective Bargaining Agreements, the Defendants agreed to be bound by the provisions of the Agreements and Declarations of Trust, which created the Plaintiffs' Trust Funds.

4. Pursuant to the provisions of the Collective Bargaining Agreements and Trust Agreements, the Defendants are required to submit monthly reports, which list the number of hours worked by its carpenter employees, and the Defendants are required to pay contributions based upon the hours listed.

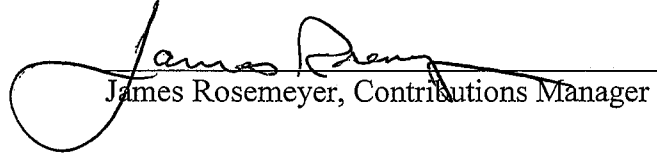
5. The Defendants submitted the contribution reports for the period November 2007 through February 2008 but did not pay the contributions. The reports show that \$20,915.82 is owed in ERISA contributions. The Defendants also failed to remit the union dues it withheld from the employees' wages. The amount of dues withheld is \$1,432.90 for the period November 2007 through February 2008.

6. Because of its failure to pay contributions in a timely manner, the Trust Agreement and Collective Bargaining Agreement mandate the assessment of liquidated damages. The liquidated damages calculation was based on the rate set forth in the controlling Trust Agreements, which is 1.5% compounded per month. The amount of liquidated damages owed is \$2,581.77 for the period January 2007 through February 2008.

7. The interest calculation is based on the ERISA Section awarding such interest, 29 U.S.C. § 1132(g)(2) and because the relevant Trust Agreements do not specify the rate of interest, the calculations were done pursuant to Section 6621 of the Internal Revenue Code. The amount of interest owed is \$396.01.

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in this Declaration is true and correct.

Date: April 29, 2008

  
James Rosemeyer, Contributions Manager

4/29/2008

Full Court Sports Floors, Inc.  
 16558 Ash Lane  
 Lockport, Il. 60441

Account #22045

<u>Contributions</u>	<u>Liquidated Damages</u>	<u>Interest</u>	<u>Dues</u>
Jan-07	\$158.68		
Feb-07	\$202.27		
May-07	\$90.71		
Jun-07      \$26.82	\$185.33	\$1.60	
Jul-07	\$96.32		
Aug-07	\$331.43		
Sep-07	\$98.87		
Oct-07	\$122.08		
Nov-07      \$9,636.00	\$744.71	\$239.09	\$661.70
Dec-07      \$4,983.00	\$305.77	\$91.98	\$341.18
Jan-08      \$3,630.00	\$165.81	\$45.20	\$248.73
Feb-08 <u>\$2,640.00</u>	<u>\$79.79</u>	<u>\$18.13</u>	<u>\$181.29</u>
totals:      \$20,915.82	\$2,581.77	\$396.01	\$1,432.90

**SEE INSTRUCTIONS ON REVERSE**

H & W	8.960
Con Pen	6.910
Appren.	.490
INTL FND	.060
LAE MGMT	.020
INST FND	.020
FEI	.030
*CISCO	.010

HOURS PAID IN EXCESS OF 175 HR. CAP : 00 : 00 : 00

DUES CHECKOFF IS CURRENTLY 3 % OF EACH  
2. PLAYERS MUST SIGN A CHECKOFF CARD

Month of \_\_\_\_\_

COPY

584

**SUBMIT ONE CHECK FOR THE  
GRAND TOTAL & MAKE  
PAYABLE TO:  
CHICAGO  
CARPENTERS TRUST FUNDS  
P.O. BOX 94432  
CHICAGO, IL 60690**

OWNER-PARTNER-OFFICER

## DUE BY 1/15/2008 \*CISCO

CC-202-K 7105



CC-202-A 74

# **EXHIBIT C**

**Exhibit C**



IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

TRUSTEES of the CHICAGO REGIONAL  
COUNCIL OF CARPENTERS PENSION FUND,  
CHICAGO REGIONAL COUNCIL OF  
CARPENTERS WELFARE FUND, and CHICAGO  
REGIONAL COUNCIL OF CARPENTERS  
APPRENTICE & TRAINEE PROGRAM FUND

Plaintiffs,

v.

FULL COURT SPORTS FLOORS, INC., and  
KEITH COOTE, individually and  
d/b/a Full Court Sports Floors, Inc.

Defendants.

CASE NO. 08CV2067

JUDGE DER-YEGHIAYAN

**DECLARATION OF DAVID P. LICHTMAN**

Pursuant to 28 U.S.C. § 1746, I, David P. Lichtman, do declare under penalty of perjury that the following is true and correct:

1. I am an associate in the law firm of Whitfield McGann & Ketterman and one of the attorneys for Plaintiffs in the above captioned matter. I am licensed to practice law in the State of Illinois and for the United States District Court for the Northern District of Illinois. I make this Declaration in support of Plaintiffs' Motion for Default Judgment.

2. I have personal knowledge of the facts stated herein and am competent to give testimony as recited herein and from my own personal knowledge.

3. The Collective Bargaining Agreement and the Trust Agreements under which this action is based provide for the payment of liquidated damages, audit fees and attorneys' fees and

costs incurred for failure of a signatory contractor to pay contributions in accordance with those Agreements.

4. I, David P. Lichtman, have devoted 10 hours in connection with the above-captioned case at the rate of \$175.00 per hour. My total billings are \$1,750.00.

5. In addition, the filing fee was \$350.00 and the fees for service of process were an additional \$55.00. These costs total \$405.00.

6. I certify that the attached detailed attorney fees and costs totaling \$2,155.00 were necessary and reasonable.

7. Notice of this Motion for Default was given to Defendants by mailing a copy of the same to Keith Coote, individually and as registered agent of Full Court Sports Floors, Inc., at 16558 Ash Lane, Lockport, IL 60441.

Dated this 7th Day of May, 2008.

/s/ DAVID P. LICHTMAN  
Attorney for the Plaintiffs.

David P. Lichtman (#6290051)  
Whitfield McGann & Kettermann  
111 E. Wacker Drive  
Suite 2600  
Chicago, IL 60601  
(312) 251-9700, Fax (312) 251-9701  
dlichtman@whitfield-mcgann.com

## Complaints

1:07-cv-99999 Plaintiff v. Defendant

### United States District Court

Northern District of Illinois - CM/ECF LIVE, Ver 3.1.3

## Notice of Electronic Filing

The following transaction was entered by Lichtman, David on 4/11/2008 at 12:13 PM CDT and filed on 4/11/2008

**Case Name:** Plaintiff v. Defendant

**Case Number:** 1:07-cv-99999

**Filer:** Plaintiff

**Document Number:** 2507

### Docket Text:

**COMPLAINT** filed by Plaintiff; Filing fee \$ 350, receipt number 0752000000002688320.  
(Attachments: # (1) Civil Cover Sheet, # (2) Appearance, # (3) Summons, # (4) Summons)  
(Lichtman, David)

**1:07-cv-99999 Notice has been electronically mailed to:**

Matthew W Miller mwm@cassiday.com

**1:07-cv-99999 Notice has been delivered by other means to:**

Plaintiff

The following document(s) are associated with this transaction:

**Document description:**Main Document

**Original filename:**n/a

**Electronic document Stamp:**

[STAMP dcecfStamp\_ID=1040059490 [Date=4/11/2008] [FileNumber=4679153-0]  
] [1c29a9343d100828d0258faade4251630037b47280d2ca654377633505ce06bf7a9  
a085197ee188e843bbf8b2890d4659d54879e427f2520c455fe807eaa200d]]

**Document description:**Civil Cover Sheet

**Original filename:**n/a

**Electronic document Stamp:**

[STAMP dcecfStamp\_ID=1040059490 [Date=4/11/2008] [FileNumber=4679153-1]  
] [0552458925d4ad91c086748c9b92628594639f65ce382624d34c84f4aed49f3cfa6  
75300298a8eb5dd7a46cbcd509fc45756b6144b61d8924f928a60fa45fcf7]]

**Document description:** Appearance

**Original filename:**n/a

**STERN PROCESS & INVESTIGATION, LLC**

Tax ID 04-3801615

205 W. RANDOLPH ST 1210

CHICAGO, IL, 60606

Phone (312)-853-2150

Fax (312)-853-3119

**Customer**

WHITFIELD, MCGANN &amp; KETTERMAN

111 E WACKER DRIVE 2600

CHICAGO, IL, 60601

Phone: (312)-251-9700 Fax: (312)-251-9701

**Invoice# 182704**

Date Of Invoice: 4/16/2008

Plaintiff: Trustees of the Chicago Regional Council of Carpenters Pension Fund, et al.

Court CaseID: 08CV2067

Firm# N7644

Case Returned Date: 5/1/08

County: UNITED STATES DISTRICT COURT

Process Server: MICHAEL P. FEEHAN

ProcessType: SUMMONS AND COMPLAINT

Defendant:#1 FULL COURT SPORTS FLOORS, INC

Type Of Service: CORPORATE SERVICE

Person Served: JENNIFER COOTE (CORPORATE)

Date Of Service: 4/16/2008 Time: 10:30 AM

Sex FEMALE Age 34

Height 5'2"

Build THIN

Hair Color BROWN

Race WHITE

Defendant:#2 KEITH COOTE

Type Of Service: ABODE SERVICE

Person Served: JENNIFER COOTE (WIFE)

Date Of Service: 4/16/2008 Time: 10:30 AM

Sex FEMALE Age 34

Height 5'2"

Build THIN

Hair Color BROWN

Race WHITE

Location 16558 ASH LANE , LOCKPORT, IL, 60441

Type Of Premise: SINGLE FAMILY HOME

Delivery Charge

\$55.00

Rush

\$0.00

Bad Address

\$0.00

Filing

\$0.00

No Contact

\$0.00

Investigation

\$0.00

Database/Skip

\$0.00

Advanced fees

\$0.00

**Total:****\$55.00**

Date Received

Check No

Amount Received

\$0.00

Balance Due

\$55.00

INFORMATION DEEMED RELIABLE BUT NOT GUARANTEED

PAYABLE UPON RECEIPT, 2% PER MONTH

4/30/2008  
4:17 PMWHITFIELD, McGANN & KETTERMAN  
Slip Listing

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## Selection Criteria

Slip Date            Earliest - 4/30/2008  
Case (hand select)    Include: CTF-C./N7644/22045  
Slip Classification    Open  
Case (hand select)    Include: CTF-C./N7644/22045

Rate Info - identifies rate source and level

Slip ID	Dates and Time	ATTORNEY Activity	Units DNB Time	Rate Rate Info	Slip Value
	Posting Status	Case Reference	Est. Time Variance	Bill Status	
355974	TIME	DPL	0.50	175.00	87.50
	4/9/2008	Billable	0.00	T@7	
	WIP	CTF-C./N7644/22045	0.00		
	Review referral from Trust funds on 04/08/08; prepare file; review corporate status and registered agent information for legal process.		0.00		
355975	TIME	DPL	2.00	175.00	350.00
	4/9/2008	Billable	0.00	T@7	
	WIP	CTF-C./N7644/22045	0.00		
	Prepared summons, complaint, appearance forms and civil cover sheet for Trust Funds' claims and compliance matters pursuant to ERISA Sec. 1132, 1145 and THA Sec. 301.		0.00		
355976	TIME	CPW			
	4/9/2008	Lexis	0.00	A@1	
	WIP	CTF-C./N7644/22045	0.00		
	Search Business Corporations database for corporate information including registered agent of the corporation for purposes of service; search for related companies; perform asset search of company and principals.		0.00		
356050	TIME	DPL	0.40	175.00	70.00
	4/10/2008	Billable	0.00	T@7	
	WIP	CTF-C./N7644/22045	0.00		
	Review complaint filed at the Federal Court; enter pertinent information (e.g., filing date, case number and assigned judge) into database; review judge's standing order regarding pre-trial litigation, motion practice and status hearing dates; update file/database regarding same.		0.00		
356408	TIME	DPL	1.00	175.00	175.00
	4/11/2008	Billable	0.00	T@7	
	WIP	CTF-C./N7644/22045	0.00		
	Prepare correspondence to legal process		0.00		

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Slip Listing

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Slip ID		ATTORNEY	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Case	Est. Time	Bill Status	
Description		Reference	Variance		
server Scott Forrest Stern & Associates, Inc. regarding service of the summons and complaint on the defendant; prepare correspondence to James Rosemeyer, ERISA Contributions Manager, Chicago District Council of Carpenters' Trust Funds regarding the filing of the complaint; enclose copy of the summons and complaint; docket follow-up dates for service.					
356346	TIME	DPL	0.40	175.00	70.00
4/18/2008		Billable	0.00	T@7	
WIP		CTF-C./N7644/22045	0.00		
Review Scott Forrest Stern & Associates, Inc.'s report on service of the summons and complaint; review process server remarks regarding details of service; review affidavit of service for legality; electronically file the proof of service with the clerk of the U.S. District Court for the Northern Dist. of Illinois; docket follow-up dates for Answer due date.			0.00		
356410	TIME	DPL	0.20	175.00	35.00
4/21/2008		Billable	0.00	T@7	
WIP		CTF-C./N7644/22045	0.00		
Review e-mail sent by the U.S. Dist. Court for the Northern Dist. of Illinois regarding the proof of filing the summons returned as executed; download documents to the file folder; print document and enclose in file.			0.00		
356409	TIME	DPL	0.50	175.00	87.50
4/21/2008		Billable	0.00	T@7	
WIP		CTF-C./N7644/22045	0.00		
Draft correspondence to James Rosemeyer, ERISA Contributions Manager, Chicago District Council of Carpenters' Trust Funds requesting a breakdown of all ERISA fringe benefit contributions owed and the accompanying calculation of liquidated damages and interest pursuant to the terms of the trust agreements and Internal Revenue Code.			0.00		
356881	TIME	DPL	0.40	175.00	70.00
4/28/2008		Billable	0.00	T@7	
WIP		CTF-C./N7644/22045	0.00		
Review e-mail sent by the U.S. Dist. Court for the Northern Dist. of Illinois regarding MINUTE entry before Judge Samuel Der-Yeghiayan: Initial status hearing set for 5/13/08 at 9:00 a.m. At least for working			0.00		

4/30/2008  
4:17 PMWHITFIELD, McGANN & KETTERMAN  
Slip Listing

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Slip ID		ATTORNEY	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Case	Est. Time	Bill Status	
Description		Reference	Variance		
days before the initial status hearing, the parties shall conduct a Federal Rule of Civil Procedure 26(f) conference and file a joint written Status Report, not to exceed five pages in length, and file the Court's Joint Jurisdictional Status Report and deliver courtesy copies to this Court's chambers; download document to the file folder; print document and enclose in file.					
356981	TIME	DPL	0.25	175.00	43.75
4/29/2008		Billable	0.00	T@7	
WIP		CTF-C./N7644/22045	0.00		
Review correspondence from Earl Oliver, Trust Fund Field Representative, regarding amounts owed by signatory; load information into database and file.			0.00		
357029	TIME	DPL	1.00	175.00	175.00
4/29/2008		Billable	0.00	T@7	
WIP		CTF-C./N7644/22045	0.00		
Prepare affidavit for Trust Fund Manager James T. Rosemeyer in support of the Trust Funds' motion for default judgment; affidavit to support claim for ERISA fringe benefit contributions, and calculation of liquidated damages and interest pursuant to the terms of the trust agreements and Internal Revenue Code; prepare correspondence to Rosemeyer regarding the affidavit and request for execution.			0.00		
357118	TIME	DPL	0.10	175.00	17.50
4/30/2008		Billable	0.00	T@7	
WIP		CTF-C./N7644/22045	0.00		
Telephone message left with Judge Der-Yeghiayan's Courtroom Deputy, Michael Wing, requesting that deadline to file Initial Status Report and Joint Jurisdictional Status Report be pushed back until after May 6 so as to allow time to determine whether signatory will file an answer; if no answer is filed, request to present motion for default judgment on May 13.			0.00		
357119	TIME	DPL	2.00	175.00	350.00
4/30/2008		Billable	0.00	T@7	
WIP		CTF-C./N7644/22045	0.00		
Prepare motion for default judgment pursuant to F. Rul. Civ. P. 55 for failure to Answer or otherwise plea.			0.00		

4/30/2008  
4:17 PMWHITFIELD, McGANN & KETTERMAN  
Slip Listing

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Slip ID		ATTORNEY	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Case	Est. Time	Bill Status	
Description		Reference	Variance		
357120	TIME	DPL	0.50	175.00	87.50
4/30/2008		Billable	0.00	T@7	
WIP		CTF-C./N7644/22045	0.00		
Prepare a proposed judgment in support of the Trust Funds motion; calculate all amounts owed.			0.00		
357121	TIME	DPL	0.75	175.00	131.25
4/30/2008		Billable	0.00	T@7	
WIP		CTF-C./N7644/22045	0.00		
Review file for all entries for the attorney billings and costs incurred; compare with work performed on the file; prepare attorney fee declaration / affidavit and exhibits; incorporate amounts into themotion and judgment order; prepare the document for electronic filing.			0.00		
Grand Total					
			Billable	10.35	1795.50
			Unbillable	0.00	0.00
			Total	10.35	1795.50

10.00 @ \$ 175 = \$ 1,750.00  
 Filing Fee  
 Process Service Fee  
 \$ 350.00  
 \$ 55.00  
 \$ 2,155.00